

Our organizations have developed, published and distributed Amateur Radio licensing study materials for more than 25 years. Our books, software, and audio courses authored by Gordon West, WB6NOA, are used by thousands of ham radio applicants each year to earn their entry-level Technician Class licenses; and by thousands of licensed Amateur Radio operators to earn their upgrade General Class and Extra Class licenses.

As a publisher and distributor of these materials, our organizations make a large financial investment at each licensing cycle to develop new materials including books, audio tapes and CDs, and software, along with the packaging and promotion materials required to bring these products to market.

I wish to be brief in my comments to all 4 of the petitions for restructuring of the Amateur Radio licensing by the FCC.

A new entry-level examination is required in order to make the Amateur Radio service more accessible to those who wish to enter the hobby. The current Technician Class Element 2 question pool is far too large (511 questions) and complex (schematic diagrams, mathematical electronics formulas, etc.) for those who wish to get started in Amateur Radio, especially youngsters. Our organizations support the proposals calling for a new entry-level license, with appropriate power limitations and broader access to the HF bands. The entry-level question pool should be limited to about 200 questions for a 20 question examination. It would be prudent on the part of the Commissioners if the new FCC rules would mandate an exact number of questions (no more and no less than...) so that the NCVEC Question Pool Committee cannot arbitrarily and unnecessarily expand the entry level question pool beyond what is necessary for the new licensing examination.

There should be no automatic upgrade for current Novice, Technician and Technician-Plus class licensees to the General class license. It is clear that the knowledge base required to safely and successfully get on the air with General class privileges (with power output of 1,500 watts) requires that new General class licensees demonstrate their understanding of band plans, power levels, RF safety, and a host of other material. An automatic upgrade, without this demonstration of knowledge, is an invitation to disaster.

Morse code requirements for all classes of license should be discontinued. CW is simply one of many operating modes available to amateur operators. No special knowledge of SSB, data, FM or other operating modes is required, and none should be required for Morse code.

Finally, the FCC must carefully consider the timing of its Report and Order authorizing a new license class and restructuring. Currently, the NCVEC Question Pool Committee operates on a 4-year cycle of revisions to the various question pools. We are just now completing revisions to the Element 3 General class materials for the pool that is effective July 1, 2004 through June 30, 2008. Last year, we completed revisions to the Element 2 Technician Class materials for the pool that is valid from July 1, 2003 through June 30, 2008. The predictability of this 4-year cycle is very important to the economic viability of publishers and distributors like us. It allows our organizations to publish adequate quantities of books and other materials in a cost-effective manner that makes our products affordable to the consumer. The 4 proposals for restructuring basically request that the current Element 2 pool be set aside out of cycle, and place "at risk" the validity of the new Element 3 pool. Therefore, it is our request that the FCC carefully plan the timing of the

implementation of any restructuring to allow organizations such as ours adequate time to sell-down existing inventories of products and develop new materials.

Respectfully submitted by:

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